REMARKS

Claims 1-20 are pending in the application.

Claims 1, 2, 10-13, 21, and 22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,236,996 to <u>Bapat et al.</u> in view of U.S. Patent No. 6,374,256 to <u>Ng et al.</u> Applicant respectfully traverses the rejection.

The Examiner asserted that the respective features of amended claims 1 and 12 of "the MO having a table storing information on the state of the external apparatus" and "wherein the MO is provided inside the database so as to have a table storing information on the state of the apparatus" are disclosed in <u>Bapat et al.</u> at column 23, lines 15-35 and figures 12B and 13A. The cited section and figures appear to relate exclusively to access rights for managed objects, and do not appear to relate to a state of an external apparatus. Applicant, therefore, respectfully submits that <u>Bapat et al.</u>, as relied upon by the Examiner, fail to disclose the above-cited features of claims 1 and 12.

In addition, the Examiner conceded that the respective features of amended claims 1 and 12 of "the MO having a table storing a stored procedure defining a method related to the table" and "wherein the MO is provided inside the database so as to have a table storing a stored procedure defining a method related to the table" are not disclosed in Bapat et al.. The Examiner relied upon column 4, lines 45-50 of Ng et al. as disclosure of this feature. Applicant respectfully submits that there is no support in either Bapat et al. or Ng et al. for the combination proposed by the Examiner. The Examiner applied a general objective that was stated in Ng et al. of allowing users to develop software routines to manipulate tables and data in a database to the access control system of Bapat et al. where the objective of the system is to restrict a user's access to objects that are managed using a database. It would certainly contradict the objective

of the system described in <u>Bapat et al.</u> to allow a user to manipulate the access control database using software routines—when the very function of the access control database is to control a user's access to managed objects. Therefore, the applied portions of <u>Bapat et al.</u> and <u>Ng et al.</u> have contradictory objectives that are not compatible with each other. The cited references, thus, teach away from the combination proposed by the Examiner and any such combination would require improper hindsight from the claimed invention. Accordingly, applicants respectfully submit that claims 1 and 12, together with claims 2, 10-11, 13, and 21-22 dependent therefrom, respectively, are patentable over <u>Bapat et al.</u> and <u>Ng et al.</u>, individually and in combination, for at least the above-stated reasons.

Claims 3 and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over

Bapat et al. in view of Ng et al. and further in view of U.S. Patent No. 6,735,615 to Iwayama et
al.; claims 4-9 and 15-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over

Bapat et al. in view of Ng et al. and further in view of U.S. Patent No. 5,848,415 to Guck; claim
4 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Bapat et al. in view of Ng
et al. and further in view of U.S. Patent No. 6,459,779 to Wardin et al.; and claims 5-9 stand
rejected under 35 U.S.C. § 103(a) as being unpatentable over Bapat et al. in view of Ng et al. and
further in view of Wardin et al. and Guck. Applicant respectfully traverses the Examiner's claim
rejections.

The Examiner cited the additional references specifically to disclose the additional features recited in the rejected dependent claims. These additional references, as applied by the Examiner, are, thus, ineffective in overcoming the above-stated deficiencies of Bapat et al. and Ng et al. with respect to base claims 1 and 12, even assuming that it would be obvious to one skilled in the art to combine them in the manner proposed by the Examiner. Applicant,

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accordingly, respectfully submits that claims 3-9 and 14-20, dependent from claims 1 and 12,

respectively, are patentable over the cited references for at least the above-stated reasons

regarding base claims 1 and 12.

Statements appearing above in respect to the disclosures in the cited references represent

the present opinions of the undersigned attorney and, in the event that the Examiner disagrees

with any of such opinions, it is respectfully requested that the Examiner specifically indicate

those portions of the respective reference providing the basis for a contrary view.

The Examiner has made of record, but not applied, an additional U.S. patent. Applicant

appreciates the Examiner's implicit finding that this reference, whether considered alone or in

combination with others, does not render the claims of the present application unpatentable.

In view of the remarks set forth above, this application is in condition for allowance

which action is respectfully requested. However, if for any reason the Examiner should consider

this application not to be in condition for allowance, the Examiner is respectfully requested to

telephone the undersigned attorney at the number listed below prior to issuing a further Action.

Any fee due with this paper may be charged to Deposit Account No. 50-1290.

Respectfully suppritted,

Dexter T. Chang

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